

# Walden Macht & Haran LLP

**W|M|H**One Broadway, 6<sup>th</sup> Floor  
New York, NY 10004  
212 335 2030**SEALED CASE - HIGHLY CONFIDENTIAL**

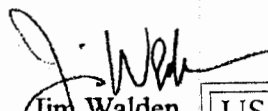
August 15, 2016

VIA FAX (212.805.7986)Hon. Paul G. Gardephe  
United States District Court  
Southern District of New York  
40 Foley Square, Room 2204  
New York, New York 10007Re: United States v. Gavin Campion, S3 15 Cr. 536 (PGG)

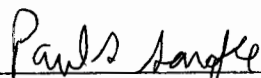
Dear Judge Gardephe:

I write as counsel to the Defendant Gavin Campion in the above-referenced matter to respectfully request a two-day exception to the travel restriction imposed in Defendant's bail order. On June 30, 2016, Mr. Campion pleaded guilty to a two-count Sealed Information. He was released from custody that same day upon signing a \$350,000 bond and posting \$100,000 cash security with the Clerk of the Court. All four of the required co-signers have now appeared at the U.S. Consulate in Australia and co-signed the bond. We understand that Mr. Campion has reported as required to his Pre-Trial Services Officer Andrew R. Kessler-Cleary. The bail order restricts Mr. Campion's travel to the Southern and Eastern Districts of New York and Australia. We are writing to respectfully request the Court's permission for Mr. Campion to travel for two days this week to Singapore for important business meetings related to consulting work he performs for Dubber, an Australian technology company. We have provided additional details regarding Mr. Campion's proposed travel to the U.S. Attorney's Office, and we will also provide an itinerary to that Office and Pre-Trial Services in advance. We will promptly provide any additional information the Court wishes to consider. We make this request with the consent of the U.S. Attorney's Office (AUSA Damian Williams) and the Pre-Trial Services Office (PSO Andrew R. Kessler-Cleary). Finally, we respectfully request that this letter be filed under seal because this is a sealed matter.

Sincerely,

  
Jim Walden

SO ORDERED:

  
Hon. Paul G. Gardephe  
United States District Judge

Aug. 19, 2016

USDC SDNY DOCUMENT ELECTRONICALLY FILED DOC #: DATE FILED: 8/19/16
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cc: AUSA Damian Williams; AUSA Andrea Griswold; PSO Andrew R. Kessler-Cleary